

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION NO. 3:17-cv-05806-RJB

DECLARATION OF LA ROND
BAKER IN SUPPORT OF
WASHINGTON'S MOTION FOR
PARTIAL SUMMARY JUDGMENT
ON THE GEO GROUP, INC.'S
AFFIRMATIVE DEFENSES

Under penalty of perjury under the laws of the United States of America I, La Rond Baker, certify that the below is true and correct:

1. I am over the age of 18 and competent to testify in this matter.
2. I am an Assistant Attorney General in the Civil Rights Division of the Washington State Attorney General's Office and I represent the State of Washington in this matter.
3. Attached hereto as Baker Declaration Exhibit A is a true and correct copy of GEO's Responses to Washington's Second Set of Requests for Admissions.
4. On August 10, 2018, GEO took a Federal Rule of Civil Procedure 30(b)(6) deposition of Washington. Attached hereto as Baker Declaration Exhibit B is a true and correct copy of an excerpt of the Washington 30(b)(6) deposition transcript.

DECLARATION OF LA ROND BAKER IN
SUPPORT OF WASHINGTON'S MOTION
FOR PARTIAL SUMMARY JUDGMENT ON
THE GEO GROUP, INC.'S AFFIRMATIVE
DEFENSES

5. Attached hereto as Baker Declaration Exhibit C is a true and correct copy of GEO's Responses to Washington's First Interrogatories.

6. On July 9, 2018, Washington took a Federal Rule of Civil Procedure 30(b)(6) deposition of GEO in the person of Ryan Kimble. Attached hereto as Baker Declaration Exhibit D is a true and correct copy of an excerpt of the GEO 30(b)(6) deposition transcript.

7. On January 31, 2019, Washington deposed Alisha Singleton, a GEO employee who works as a Classification Officer at the NWDC. Attached hereto as Baker Declaration Exhibit E is a true and correct copy of an excerpt of the Alisha Singleton deposition transcript.

8. On January 30, 2019, Washington deposed Bertha Henderson, a GEO employee who works as a Food Service Manager at the NWDC. Attached hereto as Baker Declaration Exhibit F is a true and correct copy of an excerpt of the Bertha Henderson deposition transcript.

9. On February 1, 2019, Washington deposed William McHatton, a former GEO employee who worked as Assistant Warden and Compliance Officer at the NWDC. Attached hereto as Baker Declaration Exhibit G is a true and correct copy of an excerpt of the William McHatton deposition transcript.

10. As of April 11, 2019, Washington has produced 21,971 pages of documents to GEO, including a complete production of all responsive and non-privileged documents GEO requested from the Governor's Office and Washington State Department of Labor and Industries.

Executed this 11th day of April 2019 in Seattle, Washington.

s/ La Rond Baker

LA ROND BAKER, WSBA No. 43610
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

Dated this 12th day of April 2019.

s/ Caitilin Hall
CAITILIN HALL
Legal Assistant